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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

BRIAN J. BOQUIST,

Case No. 6:19-cv-01163-MC

Plaintiff,

v.

**DECLARATION OF ELIZABETH A.
JONES IN SUPPORT OF PLAINTIFF'S
COST BILL**

OREGON STATE SENATE PRESIDENT
PETER COURTNEY, in his individual and
official capacities; SENATOR FLOYD
PROZANSKI, in his individual and official
capacities as Chairman of the Senate Special
Committee on Conduct, SENATOR JAMES
MANNING, in his individual and official
capacities as member of the Special Senate
Conduct Committee,

Defendants.

I, Elizabeth A. Jones, hereby declare under penalty of perjury that the following is true and correct:

1. I am one of the attorneys representing Plaintiff Brian J. Boquist in this matter. This Declaration is offered in support of the Cost Bill being submitted on behalf of Plaintiff.

2. The costs sought are for performed services which fees have been paid by Plaintiff. These costs were necessarily incurred in the prosecution of this action between 2019 and 2023. Plaintiff presents a reasonable request for costs considering the case has been litigated in the Oregon U.S. District Court and the Ninth Circuit Court of Appeals for almost four years.

3. Attached to this declaration and marked “Exhibit 1” are true and correct copies of publicly available records showing Fees of the Clerk costs paid by Plaintiff on July 26, 2019 (\$400); January 30, 2020 (\$405); and January 31, 2020 (\$505).

4. Attached to this declaration and marked “Exhibit 2” are true and correct copies of invoices and checks paid by Plaintiff in 2022/23 for printed and electronically recorded deposition transcripts obtained for use in the case on remand from the Ninth Circuit. Plaintiff is not pursuing witness fees for Brenda Baumgart.

7. Attached to this declaration and marked “Exhibit32” are true and correct copies of invoices and checks paid by Plaintiff in 2019/20 for printed transcripts of public proceedings obtained for use in the case.

8. Plaintiff also seeks Court docket fees in the amount of \$20 pursuant to 28 U.S.C. § 1923(a), for **\$24,869.46** in total requested costs.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 31st day of July, 2023.

s/ Elizabeth A. Jones
Elizabeth A. Jones, OSB #201184
Vance D. Day, OSB #912487
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF ELIZABETH A. JONES
IN SUPPORT OF PLAINTIFF'S COST BILL on:

Tracy Ickes White
Marc Abrams
Oregon Department of Justice
100 SW Market Street
Portland, OR 97201
Attorneys for Defendant

by the following indicated method or methods:



by **electronic means through the Court's Case Management/Electronic Case File system** on the date set forth below;

by **emailing** a copy thereof to each attorney at each attorney's last-known email address on the date set forth below;

by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to plaintiff's last-known address listed above and depositing it in the U.S. mail at Salem, Oregon on the date set forth below.

DATED this 31st day of July, 2023.

s/ Elizabeth A. Jones
Elizabeth A. Jones, OSB #201184
Of Attorneys for Plaintiff